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Attorneys for Defendant  
LGI Holdings LLC d/b/a Alphabet Wholesale

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

CLEANVIEW DISTRIBUTION GROUP  
LLC, a Wyoming limited liability  
company; SMASH HIT TRADING LLC, a  
Wyoming limited liability company; and  
GREEN GOLD ICE LLC, a Wyoming  
limited liability company,  
Plaintiffs,

vs.

LGI HOLDINGS, LLC, a Wyoming  
limited liability company; ALPHABET  
WHOLESALE, a business organization,  
form unknown; ALPHABET  
WHOLESALE, INC., a corporation;  
ALPHABET WHOLESALE, LLC, a  
limited liability company; PEYTON  
PALAIO, an individual; TED PALAIO, an  
individual; LAWRENCE LARSEN, an  
individual; MARK JENNINGS, an  
individual; MARK JENNINGS,  
individually and as a director of Alphabet  
Wholesale, business form unknown;  
MARK JENNINGS, individually and  
doing business as Alphabet Wholesale;  
JASON FOSTER, an individual; and  
DOES 1 through 10, inclusive,

Defendants.

) Case No. 2:21-cv-07178 SB (JCx)

) **DECLARATION OF PEYTON**  
) **PALAIO IN SUPPORT OF**  
) **MOTION TO DISMISS THE**  
) **COMPLAINT**

) Removal from Los Angeles County  
) Superior Court on September 7,  
) 2021

) Trial Date: November 7, 2022

1 I, PEYTON PALAIO, declare as follows:

2 1. I am the Manager of defendant LGI Holdings LLC ("LGI"). I have  
3 personal knowledge of the matter set forth herein, and if called as a witness could  
4 and would competently testify thereto. As to those matter stated on information and  
5 belief, I believe them to be true.

6 2. I submit this declaration in support of LGI's motion to dismiss the  
7 Complaint filed by Plaintiffs Cleanview Distribution Group LLC, Smash Hit Trading  
8 LLC, and Green Gold Ice, LLC, or alternatively, to transfer this action to the United  
9 States District Court for the District of Wyoming pursuant to 28 U.S.C. §§ 1404(a)  
10 and/or 1404(b).

11 3. LGI is a limited liability company organized and existing pursuant to the  
12 laws of the state of Wyoming. It maintains its principal place of business in Georgia.

13 4. LGI does business under the trade name "Alphabet Wholesale." Thus,  
14 the Complaint's allegations that "Alphabet Wholesale Inc., Alphabet Wholesale  
15 LLC, and Alphabet Wholesale," are separately existing entities affiliated with LGI  
16 "as part of larger [sic] web of companies" (Compl., ¶ 2) is inaccurate.

17  
18 I declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury under the  
19 laws of the United States of America that the foregoing is true and correct.

20  
21 Executed on October 11, 2021

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23   
24 PEYTON PALAIO  
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